

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A
LIMESTONE COLLEGE, COLLINS
MURPHY, MG FREESITES, LTD., D/B/A
PORNHUB.COM, and HAMMY MEDIA LTD.
d/b/a XHAMSTER.COM,

Defendants.

CASE NO.: 7:21-cv-03193-DCC

**CONSENT MOTION IN SUPPORT
OF *PRO HAC VICE* ADMISSION**

The undersigned local counsel hereby moves, together with the Application and Affidavit attached as Exhibit A, that Diane Cafferata of the law firm Quinn Emanuel Urquhart & Knupp LLP be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and

4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.

5. Certification of Consultation (Local Civil Rule 7.02).

☒ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose

☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

☐ No duty of consultation is required because the opposing party is proceeding pro se.

Respectfully submitted,

DATED October 25, 2023

Columbia, South Carolina

TURNER, PADGET, GRAHAM AND LANEY,
P.A.

By: /s/ Mark B. Goddard

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*Attorneys for Defendant MG Freesites Ltd. and
Mindgeek S.A.R.L.*